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12 Attorneys for Defendant

13 DAVID GOLDSTEEN

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 SUZANNE D. JACKSON,

18 Plaintiff,

20 v.

21 WILLIAM FISCHER; JON SABES;
22 STEVEN SABES; DAVID GOLDSTEEN;
23 MARVIN SIEGEL; BRIAN CAMPION;
24 LONNIE BROOKBINDER; CHETAN
25 N ORBIT, LLC ; SPECIGEN, INC. ; PEER
26 DREAMS INC.; NOTEBOOKZ INC.;
ILEONARDO.COM INC.; NEW MOON LLC;
MONVIA LLC; and SAZANI BEACH
HOTEL,

27 Defendants.

Case No. 3:11-cv-02753-JSW

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT;
DECLARATION OF SAMUEL R.
HELLFELD IN SUPPORT**

WHEREAS, Plaintiff served her complaint on Defendant David Goldsteen on August 27, 2011;

WHEREAS, Defendant Goldsteen has requested an extension of time to answer or otherwise respond to the complaint;

WHEREAS, Plaintiff has previously agreed to extend the time to answer or otherwise respond to the complaint to October 11, 2011 for Defendants Marvin Siegel, Jon Sabes and Steven Sabes.

WHEREAS, Plaintiff has likewise agreed to extend Defendant David Goldsteen's time to answer or otherwise respond to the complaint to October 11, 2011;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES that, subject to the Court's approval, Defendant Goldsteen shall answer or otherwise respond to the complaint on or before October 11, 2011.

Dated: September 15, 2011

SHEPPARD MULLIN RICHTER & HAMPTON, LLP

By: /s/ Robert J. Stump
Robert J. Stump
Attorney for Plaintiff Suzanne D. Jackson

Dated: September 15, 2011

OPPENHEIMER WOLFF & DONNELLY, LLP

By: /s/ Samuel R. Hellfeld
 Samuel R. Hellfeld
 Attorney for Defendant David Goldsteen

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: September __, 2011

The Honorable Jeffrey S. White

DECLARATION OF SAMUEL R. HELLFELD

I, Samuel R. Hellfeld, declare as follows:

1. I am a Senior Associate at Oppenheimer Wolff & Donnelly, LLP, counsel for Defendant David Goldsteen in this action. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify thereto.

2. As set forth in the above stipulation, the parties have agreed to extend Defendant Goldsteen's time to answer or otherwise respond to Plaintiff's complaint to October 11, 2011.

3. Plaintiff has agreed to an identical extension of time for Defendants Marvin Siegel, Jon Sabes, and Steven Sabes. (Dkt. No 16).

4. The reason for the requested extension is to give Defendant Goldsteen's counsel adequate time to come up to speed on the facts of the case and prepare Defendant Goldsteen's response to the complaint.

5. The requested extension of time should not have any significant impact on the schedule for this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 15th day of September 2011 at Minneapolis, Minnesota.

/s/ Samuel R. Hellfeld
Samuel R. Hellfeld
Attorney for Defendant
David Goldsteen

FILER'S ATTESTATION

I, Samuel R. Hellfeld, am the ECF user whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO COMPLAINT and DECLARATION OF SAMUEL R. HELLFELD IN SUPPORT. In compliance with General Order 45.X.B, I hereby attest that Robert Stumpf, counsel for Plaintiff, concurs in this filing.

Dated: September 15, 2011

/s/ Samuel R. Hellfeld
Samuel R. Hellfeld
Counsel for Defendant Goldsteen